Exhibit 6F

7/25/2014 Deposition Transcript of E. Jenkins (excerpted)

	Page 1		Page 3
1	EDSEL JENKINS	1	EDSEL JENKINS
2	UNITED STATES BANKRUPTCY COURT	2	SEAN GALLAGHER, ESQ.
3	FOR THE EASTERN DISTRICT OF MICHIGAN	3	Clark Hill, PLC
4	SOUTHERN DIVISION	4	212 East Grand River Avenue
5	SOUTHERN DIVISION	5	Lansing, Michigan 48906
6	In Re:	6	Appearing on behalf of Police and Fire
7		7	Retirement System and Police and Fire General
8	CITY OF DETROIT, MICHIGAN Chapter 9	8	Retirement System.
9	Case No.13-53846	9	
10	Debtor. Hon. Steven Rhodes	10	
11	/	11	
12		12	JEREMY M. MANSON, ESQ.
13	The Videotaped Deposition of EDSEL JENKINS,	13	Williams, Williams, Rattner & Plunkett, P.C.
14	Taken at 1114 Washington Boulevard,	14	380 North Old Woodward
15	Detroit, Michigan,	15	Suite 300
16	Commencing at 9:00 a.m.,	16	Birmingham, Michigan 48009
17	Friday, July 25, 2014,	17	Appearing on behalf of Financial Guaranty
18	Before Kathy Adkins, CRR, RMR, CSR-4697.	18	Insurance Company.
19		19	
20		20	
21		21	
22		22	
23		23	
24		24	
25		25	
	Page 2		Page 4
1	EDSEL JENKINS	1	EDSEL JENKINS
2	APPEARANCES:	2	DANIEL MORRIS, ESQ.
3		3	Dentons US, LLP
4	WILLIAM E. ARNAULT, ESQ.,	4	1301 K Street, NW
5	BRETT NERAD, ESQ.	5	Suite 600, East Tower
6	Kirkland & Ellis, LLP	6	Washington, DC 20005
7	300 North LaSalle	7 8	Appearing on behalf of Official Committee of Retirees.
8	Chicago, Illinois 60654	9	
9 10	Appearing on behalf of Syncora Capital Assurance.	10	
11		11	JACOB MARTINEZ, ESQ.
12		12	Chadbourne & Parke, LLP
13		13	30 Rockefeller Plaza
14	DEBORAH KOVSKY-APAP, ESQ.,	14	New York, New York 10112
15	LESLEY S. WELWARTH, ESQ.	15	Appearing telephonically on behalf of Assured
16	Pepper Hamilton LLP	16	Guaranty Municipal Corp.
17	4000 Town Center	17	. '
18	Suite 1800	18	
19	Southfield, Michigan 48075	19	
20	Appearing on behalf of the City of Detroit.	20	ALSO PRESENT:
21		21	William A. Dunbar - Video Technician
22		22	
23		23	
24		24	
25		25	

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1	EDSEL JENKINS	1	EDSEL JENKINS
2	Q. And at that point in time was that the ideal level of	2	A. The commissioner.
3	staffing?	3	Q. Section D says approximately 95 percent of costs
4	MS. KOVSKY-APAP: Objection, form.	4	within DFD are labor related, and we had briefly
5	A. I would say no.	5	talked about this earlier, but when we were thinking
6	BY MR. ARNAULT:	6	about the costs within DFD and coming from labor, what
7	Q. And what is do you know what the ideal level of	7	exactly does that mean?
8	staffing is?	8	A. That means that 95 cents out of each dollar that is
9	A. Ideal would be to have at least 1,000 firefighters and	9	allocated to the Fire Department is for labor.
10	at least 300 EMTs in addition to the other	10	Q. What's labor comprise?
11	administrative staff.	11	A. Salaries and ben wages and benefits.
12	Q. And that's as of today you would want 1,000	12	Q. Is that for actives or is that just for actives?
13	firefighters, 300 EMT, and then what was the other	13	A. Yes.
14	number? Sorry.	14	Q. So it doesn't comprise retirees?
15	A. The other number would be the rest of the	15	A. No, they're handled by a separate entity.
16	administrative staff.	16	Q. Right. And finally we have E and it talks about some
17	Q. Do you know what the ideal staffing level would be for	17	of the ways that operations have been impacted, and we
18	the rest of the administrative staff?	18	talked about little one, right? The older work force.
19	A. Off the top of my head, another maybe 200 people.	19	A. Yes.
20	Q. And if we look down at the section C, this handles or	20	Q. The second one is labor constraints due to work rules,
21	talks about revenue, is that right?	21	seniority-based promotion, bumping, et cetera, is this
22	A. Yes.	22	referring to certain work rules within the CBAs?
23	Q. What are the sources of revenue for DFD?	23	A. Yes, labor constraints due to work rules. I know a
24	A. Sources of revenue for Fire Marshal division, that	24	the repair shop we have general mechanics that we
25	would be the annual permits for occupancy from the	25	regular shift, and you have emergency mechanics,
	Page 78		Page
1	Page 78	1	Page EDSEL JENKINS
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	EDSEL JENKINS		EDSEL JENKINS
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Page 83 Page 81 **EDSEL JENKINS** 1 **EDSEL JENKINS** 2 2 MS. KOVSKY-APAP: And to clarify, by costs money, and also creates injury. 3 3 completed, you mean anything that has not actually Q. And puts more miles on the vehicles? been ratified by the union and approved and made 4 A. Yes, it does, other than the men too, men and women 5 public; so to the extent that anything is still short 5 6 of the finish line, we're subject to the Court's order 6 Q. Yeah. And I'm sure you understand that as part of the on mediation and can't discuss it. city-wide restructuring they will be remediating a THE WITNESS: Okay. Everything is a work 8 certain amount of blight, is that right? 9 in process right now. 9 10 10 MS. KOVSKY-APAP: So might be best to just Q. And will that have a positive effect on DFD? 11 avoid this whole topic. 11 A. I believe so, yes, yes. 12 BY MR. ARNAULT: 12 Q. It will reduce the number of calls? 13 Q. Well, yeah, so I don't want to talk about what you're 13 A. The fire side, but it also will leave them, give them 14 14 more opportunity to provide emergency medical doing right now and what work rules you may or may not 15 have improved or changed, but if we could just talk 15 response, so --16 about work rules as of this date that you saw to be a 16 Q. So it will reduce the number of calls; it will 17 problem 17 decrease the number of miles on the fleet and the 18 18 Sounds like you mentioned the bumping, the people? 19 mechanics, the rules around mechanics, are there any 19 A. Yes. 20 20 other work rules that you saw as problems as of May of Q. So the remediation of blight will actually save DFD 21 21 money, would that be fair to say? 22 A. No, other than what I mentioned before, I would say 22 MS. KOVSKY-APAP: Objection, form and 23 23 foundation 24 24 Q. Nothing related to the grievance procedures? A. That's kind of soft right now because when you change 25 A. With the grievance, well, that's still under 25 one part of the equation, something else changes. Page 82 Page 84 1 **EDSEL JENKINS** 1 **EDSEL JENKINS** 2 negotiations too. That's part of how that will be 2 BY MR. ARNAULT: 3 solved, so --3 Q. Right. I guess I'm thinking if you're making, if 70 4 4 Q. Right, but -- and I don't want to know about that, but percent of the calls are to blighted structures, and 5 5 you remediate some of the blights, you're going to at the time that this document was written, outside of 6 the mediation context, did you see the grievance 6 make fewer calls, is that fair? 7 7 procedures that were in the CBAs as negatively A. Fewer calls, yeah, and would allow them to perform 8 impacting operations? 8 more fire prevention activities. 9 9 MR. GALLAGHER: Objection to form. Q. Right, which is stuff that they, activities that they 10 10 can't do now A. I would say no. 11 BY MR. ARNAULT: 11 A. That's correct. 12 Q. But changing work rules was something that was a focus 12 Q. And at the end of the day that's going to make DFD 13 13 of both you and Conway MacKenzie in May of 2013? more efficient. 14 A. Yes. 14 A. Yeah, and make the city safer. 15 Q. And then we've also, if we move down, it talks about 15 MR. GALLAGHER: Foundation, form. 16 16 aged and under-maintained facilities and equipment, BY MR. ARNAULT: 17 17 Q. So that was the current situation, if you will, and and we've talked about that, right? 18 18 then if we move down to number two, this is 19 19 Q. The fourth one, is blight significantly impacting essentially some of the restructuring tasks, is that 20 20 right? service and response times, how did blight impact 21 21 22 A. Well, today there's approximately 60,000 vacant 22 Q. And these are all areas that you think would need to 23 23 dangerous structures in the city of Detroit, and be addressed for an effective restructuring? 24 that's a fire load. 80, I would say 70 percent of our 24 A. Yes. 25 25 calls are to vacant structures. That takes up time, Q. And if we just look at little A, it says that CM